REMARKS

Applicant has amended claims 1, 4-8, 10, 19, 22-26, and 29-30, and has canceled claims 9, 11-18, 27-28, and 31-50 during prosecution of this patent application. Applicant is not conceding in this patent application that said amended and canceled claims are not patentable over the art cited by the Examiner, since the claim amendments and cancellations are only for facilitating expeditious prosecution of this patent application. Applicant respectfully reserves the right to pursue said amended and canceled claims, and other claims, in one or more continuations and/or divisional patent applications.

The specification has been amended to correct a typographical error and no new matter has been added to the specification.

The Examiner rejected claims 1, 3-10, 12-19, 21-30 and 32-46 under 35 U.S.C. § 102(a) as allegedly being anticipated by Rosenschein *et al.* (USPN 6,519,631 B1).

The Examiner rejected claims 2, 11, 20 and 31 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Rosenschein *et al.* in view of Mahmoud, "Registration and Discovery of Web Services Using JAXR with XML Registries such as UDDI and ebXML", June 2002.

The Examiner rejected claims 47-48 under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter: algorithm.

The Examiner rejected claims 49-50 under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter: algorithm.

The Examiner rejected claims 47-50 under 35 U.S.C. § 102(a) as allegedly being anticipated by Rosenschein *et al.*

Applicants respectfully traverse the claim objections, the § 101, § 102 and § 103

rejections with the following arguments.

35 U.S.C. § 101

Claims 47-48

The Examiner rejected claims 47-48 under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter: algorithm.

Since claims 47-48 have been canceled, the rejection of claims 47-48 under 35 U.S.C. § 101 is moot.

Claims 49-50

The Examiner rejected claims 49-50 under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter: algorithm.

Since claims 49-50 have been canceled, the rejection of claims 49-50 under 35 U.S.C. § 101 is moot.

35 U.S.C. § 102(a)

The Examiner rejected claims 1, 3-10, 12-19, 21-30, 32-46, and 47-50 under 35 U.S.C. § 102(a) as allegedly being anticipated by Rosenschein *et al.* (USPN 6,519,631 B1).

Since claims 9, 12-18, 27-28, and 32-50 have been canceled, the rejection of claims 9, 12-18, 27-28, and 32-50 under 35 U.S.C. § 101 is moot.

Applicants respectfully contend that Rosenschein does not anticipate claims 1 and 19, because Rosenschein does not teach each and every feature of claims 1 and 19.

For example, Rosenschein does not teach the features:

"accessing a document taxonomy that comprises M categories such that M is at least 2, wherein the document taxonomy is a based on a subject matter classification in conjunction with a collection of stored documents, wherein each category of the M categories has an associated at least one category key, wherein the category keys of all M categories collectively consist of N unique category keys sequentially ordered and denoted as CATKEY[1], CATKEY[2], ..., CATKEY[N]; ...

generating a plurality of document keys associated with said text from analysis of said text in said text format, if said entire document received by said web service host comprises said text in said text format, or if said web service host has previously performed said extracting such that said text in said text format is available to said web service host;

generating a document key vector V_{DOC} of order N, wherein said generating V_{DOC} comprises for n= 1, 2, ..., N: determining setting $V_{DOC}[n]$ equal to 1 if the plurality of document keys comprises a document key equal to CATKEY[n], otherwise setting $V_{DOC}[n]$ equal to 0;

after said generating V_{DOC}, generating a document weight vector W_{DOC} of order N, wherein said generating V_{DOC} comprises for n= 1, 2, ..., N: setting $W_{DOC}[n]$ equal to a first frequency count raised to a power P_1 greater than 1, wherein the first frequency count

consists of a number of appearances, in the document, of the document key associated with $V_{DOC}[n]$ if $V_{DOC}[n]$ is equal to 1 or consists of 0 if $V_{DOC}[n]$ is equal to 0;

for each category m (m = 1, 2, ..., M): generating a category vector $V_{CAT}(m)$ of order N, wherein said generating $V_{CAT}(m)$ comprises for n= 1, 2, ..., N: setting $V_{CAT}(m)[n]$ equal to 1 if category m has a category key equal to equal to CATKEY[n], otherwise setting $V_{CAT}(m)[n]$ equal to 0;

after said generating $V_{CAT}(m)$, for each category m (m = 1, 2, ..., M): generating a category weight vector $W_{CAT}(m)$ of order N, wherein said generating $W_{CAT}(m)$ comprises for n= 1, 2, ..., N: setting $W_{CAT}(m)[n]$ equal to a second frequency count raised to a power P_2 greater than 1, wherein the second frequency count consists of a number of appearances, in the collection of stored documents, of the category key associated with $V_{CAT}(m)[n]$ if $V_{CAT}(m)[n]$ is equal to 1 or consists of 0 if $V_{CAT}(m)[n]$ is equal to 0;

computing distances, wherein said computing distances is selected from the group consisting of computing first distances, computing second distances, computing third distances, and computing fourth distances, wherein said computing first distances comprises computing a dot product of V_{DOC} and $V_{CAT}(m)$ for m = 1, 2, ..., M, wherein said computing second distances comprises computing a dot product of V_{DOC} and $W_{CAT}(m)$ for m = 1, 2, ..., M, wherein said computing third distances comprises computing a dot product of W_{DOC} and $V_{CAT}(m)$ for m = 1, 2, ..., M, and wherein said computing fourth distances comprises computing a dot product of W_{DOC} and $W_{CAT}(m)$ for m = 1, 2, ..., M;

determining, from said computed distances, a set of closest categories to the document, if said entire document received by said web service host comprises said document keys, or if said web service host has previously performed said generating the plurality of document keys such that said document keys are available to said web service host."

Based on the preceding arguments, Applicant respectfully maintains that Rosenschein does not anticipate claims 1 and 19, and that claims 1 and 19 are in condition for allowance.

Since claims 3-8 and 10 depend from claim 1, Applicant contends that claims 3-8 and 10 are likewise in condition for allowance. Since claims 21-26 and 29-30 depend from claim 19, Applicant contends that claims 21-26 and 29-30 are likewise in condition for allowance.

In addition with respect to claims 5 and 23, Applicants respectfully contend that Rosenschein does not teach the feature: "wherein said computing distances consists of said computing first distances".

In addition with respect to claims 6 and 24, Applicants respectfully contend that Rosenschein does not teach the feature: "wherein said computing distances consists of said computing second distances".

In addition with respect to claims 7 and 25, Applicants respectfully contend that Rosenschein does not teach the feature: "wherein said computing distances consists of said computing third distances".

In addition with respect to claims 8 and 26, Applicants respectfully contend that Rosenschein does not teach the feature: "wherein said computing distances consists of said computing fourth distances".

35 U.S.C. § 103(a)

The Examiner rejected claims 2, 11, 20 and 31 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Rosenschein *et al.* in view of Mahmoud, "Registration and Discovery of Web Services Using JAXR with XML Registries such as UDDI and ebXML", June 2002.
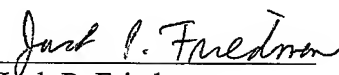
Since claims 11 and 31 have been canceled, the rejection of claims 11 and 31 under 35 U.S.C. § 103(a) is moot.

Since claims 2 and 20 respectively depend from claims 1 and 19, which Applicant has argued *supra* to not be unpatentable over Rosenschein under 35 U.S.C. §102(b), Applicant maintains that claims 2 and 20 are likewise not unpatentable over Rosenschein in view of Mahmoud under 35 U.S.C. §103(a).

CONCLUSION

Based on the preceding arguments, Applicant respectfully believes that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicant invites the Examiner to contact Applicant's representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account 09-0457.

Date: 06/04/200

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